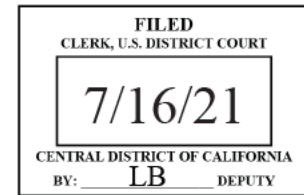


# EXHIBIT A



**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

United States of America,	)	<b>SACR 19-61JVS</b>
Plaintiff,	)	
vs.	)	
Michael John Avenatti,	)	Jury Questionnaire
Defendant,	)	
_____	)	

Final

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

**JURY QUESTIONNAIRE****PRELIMINARY INSTRUCTIONS**

Please read the following instructions carefully before completing any portion of this questionnaire. Please print your juror name and number in the space provided at the top of each page. Please answer each and every question by circling your response or by providing the information requested. Please answer each question fully. Some questions have more than one part.

**YOU ARE SWORN TO GIVE TRUE AND COMPLETE ANSWERS TO ALL QUESTIONS IN THIS QUESTIONNAIRE.** This questionnaire is designed to help simplify and shorten the jury selection process for the Court and the parties to learn enough information about each juror's background and experiences to select a fair and impartial jury. The purpose of the questionnaire is to determine whether prospective jurors can decide this case impartially based upon the evidence presented at trial and the legal instructions given by the presiding judge. The questions are not intended to inquire unnecessarily into personal matters. The use of this questionnaire will avoid the necessity of asking each prospective juror these questions in open court and will substantially shorten the jury selection process. Efforts will be made to keep your responses as confidential as possible.

Please answer all questions as fully and completely as you can to the best of your ability. If you do not know the answer to a question then write, "I don't know." There are no "right" or "wrong" answers, only truthful answers. If you have strong feelings about this case in general, please do not hesitate to share them. Although you may be a perfectly good juror in another case, this may or may not be the right case for you to sit on as an impartial juror. Both parties have the right to get honest answers and to hear your true opinions.

If you need extra space to answer any question, please use the extra blank sheets of paper included at the end of the questionnaire. Be sure to indicate on the blank page the number of the question you are answering. Do not write anything on the back of any page.

**DO NOT DISCUSS YOUR QUESTIONS AND ANSWERS OR THE CASE WITH ANYONE, NOW OR UNTIL FURTHER INSTRUCTED BY THE COURT.** You should not discuss the questions or answers with fellow jurors. It is very important that your answers be your own individual answers. More broadly, do not discuss the case with anyone, including the lawyers (except in the presence of the Court), your fellow jurors, your family, your friends, or anyone else. Do not communicate about the case in any way, including telephone, e-mail, any social media app or website (such as Facebook), or any communications app or website (such as Twitter). You must also avoid reading or hearing about the case (or anyone participating in the case) in newspapers, in magazines, on the radio or television, or on the Internet.

**DO NOT DO YOUR OWN RESEARCH ON MICHAEL AVENATTI OR ON THE CASE.** Do not conduct any research into Michael Avenatti or the case (or anyone participating in the case) at any time before your entire jury service has been completed. That includes performing Internet

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

searches, searching social media, asking other people about Mr. Avenatti or the case, reading news stories, books, or reports about Mr. Avenatti or the case, or watching films or television programs that relate to Mr. Avenatti or the case. Do not read, watch, or listen to any information about Mr. Avenatti or this case.

Michael Avenatti is presumed innocent of the charges against him, and it is the government's burden to prove, beyond a reasonable doubt, that he committed these crimes. Michael Avenatti has no burden to present any evidence at all and also has no obligation to testify at trial.

If you believe that any of your answers contain private information that could embarrass you or otherwise seriously compromise your privacy and wish to request that the Court keep them confidential and not distribute them beyond the judge and counsel, you may indicate that on one of the blank pages at the end of this form. (Please identify the specific answer or answers that you believe should remain confidential.) After a jury has been selected, all copies of your responses to the questionnaire will be returned to the Court.

#### **TRIAL SCHEDULE AND PERSONAL HARDSHIP**

The trial in this matter is expected to last approximately four to five weeks, with the trial days generally being on Tuesday through Friday from 9 a.m. to 4:30 p.m.

1. Do any circumstances exist such that serving on the jury in this case would entail serious hardship or extreme inconvenience? (Please Circle: YES or NO). If yes, please briefly describe the serious hardship or extreme inconvenience: \_\_\_\_\_

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2. Do you have any difficulty reading, speaking, or understanding English? (Please Circle: YES or NO).
3. Do you have any mental or physical condition or illness that makes you unable to serve on a jury? (Please Circle: YES or NO). If yes, please briefly describe the condition or illness: \_\_\_\_\_

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#### **GENERAL BACKGROUND**

4. How old are you? \_\_\_\_\_
5. What city do you live in? \_\_\_\_\_  
And for approximately how long? \_\_\_\_\_

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

6. In what other city or county, if any, have you lived in the last five years?

\_\_\_\_\_

7. How far did you go in school? \_\_\_\_\_

If you attended college, graduate, and/or professional school, please specify your area of study and what degree you received, if any: \_\_\_\_\_

\_\_\_\_\_

8. How are you currently employed (if you have multiple jobs, list each)? \_\_\_\_\_

\_\_\_\_\_

a. How long have you worked at your job? \_\_\_\_\_

b. If less than five years, what did you do previously? \_\_\_\_\_

c. What are your specific duties at your job? \_\_\_\_\_

\_\_\_\_\_

d. How many people, if any, do you supervise? \_\_\_\_\_

9. If you are retired, when did you retire? \_\_\_\_\_

a. What was your last job prior to retiring? \_\_\_\_\_

b. How long did you work at your last job? \_\_\_\_\_

10. If you are not employed outside of the home, please describe your circumstances (for example, a student, a homemaker, between jobs, disabled, or other) and how long it has been since you were last employed outside of the home? \_\_\_\_\_

\_\_\_\_\_

11. What is your marital status? \_\_\_\_\_

a. If married, how is your spouse employed? \_\_\_\_\_

b. Do you have any children? (Please Circle: YES or NO) If yes, how many and what are their ages? \_\_\_\_\_

\_\_\_\_\_

c. If not married, but you share a household with another adult(s), how are they employed? \_\_\_\_\_

\_\_\_\_\_

12. If you have any adult children, how are they employed? \_\_\_\_\_

\_\_\_\_\_

13. Have you, or anyone close to you, ever been employed by the federal government? (Please Circle: YES or NO). If yes, in what capacity? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

Has that employment left you with a negative, positive, or neutral impression of the federal government or individuals who work for the federal government? \_\_\_\_\_

14. What newspapers, magazines, websites, television channels or shows, radio stations or shows, or applications, if any, do you read, watch, visit, or use on a regular basis? \_\_\_\_\_

15. What newspapers, magazines, websites, television channels or shows, radio stations or shows, or applications, if any, do you read, watch, visit, or use on a regular basis to get news? \_\_\_\_\_

16. Do you watch television shows and/or read books or websites about the police, lawyers, and/or the criminal justice system? How often? Which ones? \_\_\_\_\_

17. Do you use social media websites, including Twitter, Facebook, Instagram, or others? (Please Circle: YES or NO). If yes, which ones and what functions do you use on those social media sites? \_\_\_\_\_

If you answered yes, have you ever posted online or on social media about any court case or legal proceeding? (Please Circle: YES or NO). If yes, please describe what you have posted and when. \_\_\_\_\_

18. Do you belong to or volunteer your time to any associations, organizations, clubs, or unions? (Please Circle: YES or NO). If yes, please list the group and explain your involvement and any leadership roles you have? \_\_\_\_\_

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

19. Have you, or someone close to you, ever been the victim of a crime? (Please Circle: YES or NO). If yes, please describe (including the type of crime, whether anyone was arrested, whether there was a trial, and/or what the outcome was): \_\_\_\_\_

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If you answered yes, has this experience left you with a negative, positive, or neutral impression of law enforcement, judges, prosecutors, defense attorneys, or the criminal justice system? \_\_\_\_\_

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20. Have you, or someone close to you, ever been investigated for, arrested for, charged with, or convicted of any offense (other than a minor traffic offense)? (Please Circle: YES or NO). If yes, please describe the nature of the offense, the outcome, and whether the experience has left you with a negative, positive, or neutral impression of law enforcement, judges, prosecutors, defense attorneys, or the criminal justice system: \_\_\_\_\_

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#### **PRIOR JURY SERVICE**

21. Have you ever served on a jury in a civil or criminal trial? (Please Circle: YES or NO). If yes, please describe the case(s), stating whether the trial(s) was civil or criminal, in state or federal court, and whether a verdict was reached (do NOT state the verdict, just whether one was reached): \_\_\_\_\_

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22. Have you ever served on a grand jury? (Please Circle: YES or NO). If yes, please describe when and where: \_\_\_\_\_

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JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

23. This is a criminal case. Among other things, that means that the burden of proof differs from the burdens of proof that apply in a civil case or in the grand jury. If you have previously served as a juror in a civil case or on a grand jury, would you be able to follow the Court's instructions with respect to the burdens that apply in this case? (Please Circle: YES or NO).
24. If you have previously served as a juror, was there anything about your jury experience that would make you unable to be fair and impartial in this case? (Please Circle: YES or NO). If you answered yes, please describe why: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**KNOWLEDGE AND OPINIONS OF THE CASE AND PARTIES**

25. Before today, had you read, seen, or heard anything about Mr. Avenatti? (Please Circle: YES or NO). If yes, please describe what you remember reading, seeing, and/or hearing and from where: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

26. Based on anything that you have read, seen, or heard about Mr. Avenatti, have you formed any opinions about Mr. Avenatti that might make it difficult for you to be a fair and impartial juror in this case? (Please Circle: YES or NO or Not Applicable, as I have not read/seen/heard anything about Mr. Avenatti). If yes, please explain why: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

27. Based on anything that you have read, seen, or heard about Mr. Avenatti, would you be able to follow the Court's instruction to put that information out of your mind and decide this case based only on the evidence presented at trial? (Please Circle: YES or NO or Not Applicable, as I have not read/seen/heard anything about Mr. Avenatti). If no, please explain why: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_



JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

28. Defendant in this case is Michael Avenatti. Do you, or anyone close to you, personally know or have past or present dealings with Mr. Avenatti or any of his family members? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

29. Before today, had you read, seen, or heard anything about criminal charges brought against Mr. Avenatti? (Please Circle: YES or NO). If yes, please describe what you remember reading, seeing, and/or hearing and from where: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

30. Years ago, there was an incident in connection with Super Bowl 45 in Dallas, Texas where certain fans had purchased seats that were later found to either not exist or have obstructed views. Do you remember anything about this? (Please Circle: YES or NO). If yes, what do you remember: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

31. You were instructed, and will be instructed throughout the trial, that you cannot read or listen to any accounts of this case in the media or on social media. Do you think this will be too difficult to do? (Please Circle: YES or NO). If yes, please explain why: \_\_\_\_\_

\_\_\_\_\_

If you inadvertently hear or see something, can you give the Court and the parties your assurance that you will still decide the case based only on the evidence presented in the courtroom? \_\_\_\_\_

32. Mr. Avenatti is a civil trial lawyer who sues individuals and corporations. Would you give greater or lesser weight to the evidence in the case simply because he is a lawyer? (Please Circle: YES or NO). If yes, please describe why: \_\_\_\_\_

\_\_\_\_\_

What is your opinion of civil trial lawyers? \_\_\_\_\_

\_\_\_\_\_  
Do you believe there are too many lawsuits in this country? (Please Circle: YES or NO).  
Please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**JUROR NAME:** \_\_\_\_\_

**JUROR NUMBER:** \_\_\_\_\_

Would the fact that Mr. Avenatti is a lawyer affect your ability to be fair and impartial in this case? (Please Circle: YES or NO). If yes, please describe why: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

33. Are you, or anyone close to you, a lawyer? (Please Circle: YES or NO). If yes, please describe who and your relationship to that person and whether that has left you with a negative, positive, or neutral impression of judges, prosecutors, defense attorneys, the criminal justice system, or lawyers generally: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

34. Have you ever hired a lawyer to represent you? (Please Circle: YES or NO). If yes, was there anything positive or negative about the experience of being represented by a lawyer? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

35. Have you, or someone close to you, ever served in the military? (Please Circle: YES or NO). If yes, please describe who, what branch, and how long: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

36. Have you, or someone close to you, ever had any contact with law enforcement officials that has caused you to form strong opinions, either positive or negative, regarding law enforcement? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

37. Have you, or someone close to you, ever been employed in law enforcement (including state or local police departments, federal investigatory agencies such as the FBI, the Securities and Exchange Commission, any prosecutor's office, the Department of Corrections, any regulatory agency, etc.)? (Please Circle: YES or NO). If yes, in what capacity? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Has that employment caused you to form strong opinions, either positive or negative, regarding law enforcement? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

38. Have you, or someone close to you, ever been questioned as part of a criminal investigation by a law enforcement agency? (Please Circle: YES or NO). If yes, please describe who, the circumstances, and whether the experience left you with a negative, positive, or neutral impression of law enforcement: \_\_\_\_\_

\_\_\_\_\_

39. Have you ever testified as a witness at any kind of legal proceeding, including a case or trial? (Please Circle: YES or NO). If yes, please describe the circumstances: \_\_\_\_\_

\_\_\_\_\_

40. Have you ever been involved in a civil or criminal proceeding as either a plaintiff or defendant? (Please Circle: YES or NO). If yes, please describe the circumstances: \_\_\_\_\_

\_\_\_\_\_

41. This case was investigated by special agents employed by the Internal Revenue Service – Criminal Investigations. Do you have any feelings or opinions about the Internal Revenue Service that would affect your ability to be fair and impartial to either the government or Mr. Avenatti? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

Have you, or someone close to you, had a bad experience with the Internal Revenue Service? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

If yes, would this experience affect your ability to be a fair and impartial juror? \_\_\_\_\_

\_\_\_\_\_

42. Do you, or anyone close to you, work in the criminal justice system? (Please Circle: YES or NO). If yes, please describe who and your relationship to that person and whether that has left you with a negative, positive, or neutral impression of judges, prosecutors, defense attorneys, the criminal justice system, or lawyers generally: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

43. Do you have any opinions or feelings about the criminal justice system, such as judges, prosecutors, defense lawyers, and law enforcement officials, that would make it difficult for you to be fair and impartial jurors in this case? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

44. Do you believe that our laws provide criminals with too many rights? Too few rights?

\_\_\_\_\_

\_\_\_\_\_

45. Have you, or someone close to you, ever filed for bankruptcy? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

Do you have any opinions, either positive or negative, about individuals or companies that file for bankruptcy? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

46. Under our justice system, the facts are to be determined by the jury and the law is to be determined by the Court. These two responsibilities are separate and distinct. Thus, when the Court instructs you on the law during and at the end of the trial, you are required to accept the law as the Court states it even though you might not agree with it personally. Is there any reason that you would be unwilling or unable to apply the law as given to you by the Court? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

47. Have you, or anyone close to you, ever been engaged in a lawsuit against the United States government? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

If yes, was there anything about the lawsuit that would affect your ability to serve as a fair and impartial juror? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

48. Have you, or anyone close to you, ever had any dealings with the United States Attorney's Office? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

If yes, was there anything about those circumstances that would affect your ability to serve as a fair and impartial juror? \_\_\_\_\_

49. Michael Avenatti is presumed innocent and cannot be convicted unless the jury, unanimously and based solely on the evidence presented in court, decides that his guilt has been proven beyond a reasonable doubt. The burden of proving guilt beyond a reasonable doubt rests entirely with the government. Michael Avenatti has no burden of proof whatsoever and he is not required to present any evidence. Would you have any difficulty following these rules? (Please Circle: YES or NO). If yes, please explain why: \_\_\_\_\_

50. Under the law and the Constitution, Michael Avenatti need not testify in his own defense. If he does not testify, the jury may not consider that fact in any way in reaching a decision as to whether a defendant is guilty. Would you have any difficulty following this rule of law? (Please Circle: YES or NO). If yes, please explain why: \_\_\_\_\_

51. Do you know or have you heard of any of the following people or entities, which include the lawyers in this case, people who may testify at trial, and other names and entities that may be mentioned during the course of the trial? (Please circle any for whom/which the answer is YES):

Rob Amenta	Special Agent Remoun Karlous
John Arden	Susan Katzen
Christopher Ayres	Special Agent James Kim
Leroy Baca	Glen La Palme
Richard Baeda	Los Angeles County Sheriff's Department
Gregory Barela	Filippo Marchino
Leia Bellis	Louis Masry
Brock USA, LLC	Patrick McNicholas
Christine Carlin (or Christine Avenatti Carlin)	Louis Meisinger
Thomas Cassaro	DeLeassa Penland
Courtney Cummings Cefali	Personalized Beauty Discovery, Inc. or "IPSY"
Carlos Colorado	Michelle Phan

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

Daniel Dreyer	Judy Regnier
John Drum	Edward Ricci
Michael Eagan	Special Agent Ryan Roberson
Abram Feuerstein	Brett Sagel
Jason Frank	Aimee Schabillion
James Gailey	David Sheikh
Melissa Galicia	Scott Sims
Alexis Gardner	H. Dean Steward
Tom Goeders	Andrew Stolper
Elsa Guerrero	Lisa Storie (or Lisa Storie-Avenatti)
Chris Harper	Robert Susko
Mark Horoupian	Special Agent Nshan Tashchyan
Thomas Hurrell	Long Tran
Ahmed Ibrahim	Joel Weiner
Geoffrey Johnson	David Weissman
Philip Johnson	Hassan Whiteside
Ruth Johnson	Alexander Wyman
Sandy Johnson	Marty Yeghishian

If you circled any of the above, please describe your familiarity with that person or entity:

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If you circled any of the above, would your familiarity with any person or entity affect your ability to serve as a fair and impartial juror? (Please Circle: YES or NO). If yes, please describe: \_\_\_\_\_

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52. Do you know of any reason why you may be prejudiced for or against the government, for or against any witness, or for or against Mr. Avenatti because of the nature of the charges or otherwise? \_\_\_\_\_

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JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

53. If chosen to sit as a juror, the Court will order you not to discuss this case amongst yourselves or with any others until it is submitted to you for a decision. The Court will also instruct you that you must neither form nor express any opinion on any subject connected with the case until it is finally submitted to you for your decision. Will you be able to follow these instructions? (Please Circle: YES or NO). If no, please explain why: \_\_\_\_\_

54. There are some people who, for moral, ethical, religious, or other reasons, believe that it is not proper or would find it difficult to pass judgment on the conduct of others. Do you hold such beliefs or believe that you might be affected by such beliefs? (Please Circle: YES or NO). If yes, please explain why: \_\_\_\_\_

55. Is there anything in your background or life experiences that you think we should know in connection with you being considered to serve as a juror in this case? (Please Circle: YES or NO). If yes, please explain why? \_\_\_\_\_

56. Is there any reason that you think you cannot be a fair and impartial juror in this case? (Please Circle: YES or NO). If yes, please explain why: \_\_\_\_\_

57. If the Court instructs you that your verdict must not be based on sympathy, passion, or prejudice, but only on the evidence presented in this case and on the law as the Court instructs you on it, will you be able to follow that instruction? (Please Circle: YES or NO). If no, please explain why: \_\_\_\_\_

58. The potential punishment for the offenses charged in this case is a matter that the jury should never consider in arriving at an impartial verdict of guilty or not guilty for the accused. If you are selected as a juror in this case, will you be able to hear the evidence, deliberate with your fellow jurors, and apply the law as the Court instructs you on it without speculating about whatever punishment may or may not be imposed in this case? (Please Circle: YES or NO). If no, please explain why: \_\_\_\_\_

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

59. If you are selected as a juror and hear this case, you will be required to deliberate with eleven other jurors. This will require you to discuss the evidence and the law in this case with those other jurors. Is there anything that might interfere with your ability to deliberate and reach a verdict in this case? \_\_\_\_\_

Is there anything that leads you to believe that you might be unable or unwilling to engage in such discussions with your fellow jurors? \_\_\_\_\_

**DECLARATION**

I, \_\_\_\_\_ (***print name***) declare under penalty of perjury under the laws of the United States of America that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing the questionnaire.

Signed this \_\_\_\_\_ day of July, 2021  
at Santa Ana, California.

\_\_\_\_\_  
(signature)



JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_

JUROR NAME: \_\_\_\_\_

JUROR NUMBER: \_\_\_\_\_